



**Service of Process
Transmittal**

02/02/2022

CT Log Number 540988067

TO: Janessa Turner
QBE Regional Companies (N.A.), Inc.
ONE QBE WAY
SUN PRAIRIE, WI 53596-0001

RE: Process Served in Louisiana

FOR: Regent Insurance Company (Domestic State: WI)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	HELEN ROYAL vs. REGENT INSURANCE COMPANY
DOCUMENT(S) SERVED:	--
COURT/AGENCY:	None Specified Case # 20215174
NATURE OF ACTION:	Insurance Litigation
ON WHOM PROCESS WAS SERVED:	C T Corporation System, Baton Rouge, LA
DATE AND HOUR OF SERVICE:	By Certified Mail on 02/02/2022 postmarked: "Not Post Marked"
JURISDICTION SERVED :	Louisiana
APPEARANCE OR ANSWER DUE:	None Specified
ATTORNEY(S) / SENDER(S):	None Specified
ACTION ITEMS:	CT will retain the current log Image SOP Email Notification, GSSC Claims GSSC-ClaimsLegalAdmin.US-BOX@us.qbe.com Email Notification, Ruby Remata Ruby.Remata@us.qbe.com Email Notification, Janessa Turner janessa.turner@us.qbe.com Email Notification, Taylor Willemot taylor.willemot@us.qbe.com
REGISTERED AGENT ADDRESS:	C T Corporation System 3867 Plaza Tower Dr. Baton Rouge, LA 70816 800-448-5350 MajorAccountTeam1@wolterskluwer.com

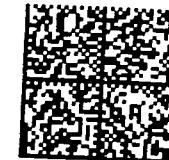
The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

R. KYLE ARDOIN
SECRETARY OF STATE
P.O. BOX 94125
BATON ROUGE, LA 70804-9125



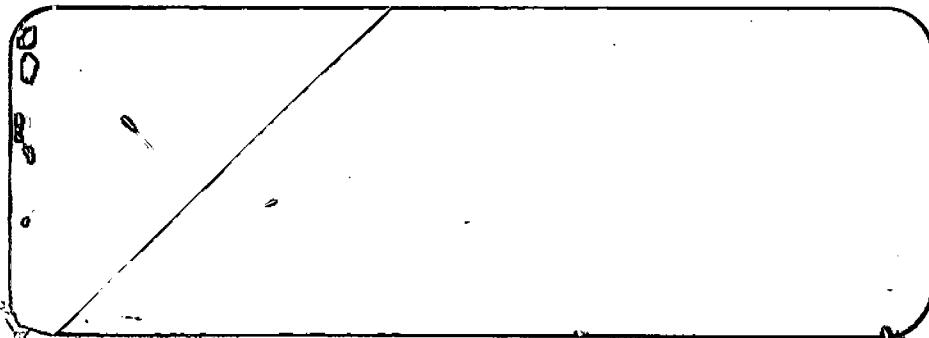
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FIRST CLASS



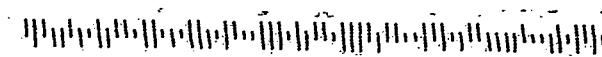
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**State of Louisiana
Secretary of State**

Legal Services Section

01/31/2022

P.O. Box 94125, Baton Rouge, LA 70804-9125
(225) 922-0415

REGENT INSURANCE COMPANY
C/O C T CORPORATION SYSTEM
3867 PLAZA TOWER DR
BATON ROUGE, LA 70816

Suit No.: 20215174
14TH JUDICIAL DISTRICT COURT
CALCASIEU PARISH

HELEN ROYAL
vs
REGENT INSURANCE COMPANY, ET AL

Dear Sir/Madam:

I am enclosing a citation served in regard to the above entitled proceeding. If you are not the intended recipient of this document, please return it to the above address with a letter of explanation. All other questions regarding this document should be addressed to the attorney that filed this proceeding.

Yours very truly,

R. KYLE ARDOIN
Secretary of State

Served on: R. KYLE ARDOIN
Served by: M. LOCKWOOD

Date: 01/28/2022
Title: DEPUTY SHERIFF

No: 1224238

TG



HELEN ROYAL
VS. 2021-005174
REGENT INSURANCE COMPANY



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: REGENT INSURANCE COMPANY

THROUGH ITS REGISTERED
AGENT: LOUISIANA SECRETARY
OF STATE
8585 ARCHIVES AVENUE
Baton Rouge, LA 70809

SERVED ON
R. KYLE ARDOIN

JAN 28 2022

SECRETARY OF STATE
COMMERCIAL DIVISION

Parish of East Baton Rouge, Louisiana, Defendant in said suit:

YOU ARE HEREBY CITED TO APPEAR before said Court, for said Parish, and to comply with the demand contained in the petition of HELEN ROYAL, (PETITION FOR DAMAGES) against you, certified copy of which petition accompanies this citation, or file your answers thereto in writing in the office of the Clerk of Court, at the Courthouse, in the City of Lake Charles, in said Parish, within fifteen (15) days after the service hereof, under penalty of default.

Witness the Honorable Judges of said Court, at Lake Charles, Louisiana, this 10th day of December 2021.

Issued and delivered January 20, 2022

Kimberly Pouillard

Deputy Clerk of Court

SERVICE INFORMATION

Received on the _____ day of _____ 20____, and on the _____ day of _____ 20____, served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service.

RETURNED:

PARISH OF _____ this _____ day of _____ 20____

SERVICE \$ _____ BY: _____
Deputy Sheriff

MILEAGE \$ _____

TOTAL \$ _____

Party No. P001



C M S 7 8 3 5 4 6 4
Filing Date: 01/20/2022 09:26 AM Page Count: 1
Case Number: 2021-005174
Document Name: 1600 Citation

HELEN ROYAL * 14TH JUDICIAL DISTRICT COURT
VERSUS * DOCKET NO. 2021-5174 G
REGENT INSURANCE COMPANY, and * CALCASIEU PARISH, LOUISIANA
RC LAKE CHARLES GROUP, LLC d/b/a
BUFFALO WILD WINGS

.....

PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel comes petitioner, **HELEN ROYAL**, domiciled in the State of Louisiana, who respectfully represents the following petition for damages, to wit:

Fax 12-10-21
Kristen Seub
FILED 12-10-21
Deputy Clerk of Court
Calcasieu Parish, Louisiana

Made defendants herein are:

1. A. **REGENT INSURANCE COMPANY**, believed to be a foreign insurance company authorized to do and doing business in the State of Louisiana at all times relevant herein that, based upon information and belief, maintained one or more policies of primary and/or excess liability insurance insuring **RC LAKE CHARLES GROUP, LLC**, against liability in the premises and, as such, is liable jointly, severally and in solido with one or more defendants for all damages which may be cast in favor of petitioner, plus costs and interest from the date of judicial demand; and
- B. **RC LAKE CHARLES GROUP, LLC**, believed to be a Louisiana limited liability company who, at all times relevant herein, was the owner of the Buffalo Wild Wings which was the location wherein petitioner slipped on and/or otherwise created the unreasonable dangerous condition that caused the subject incident and petitioner's injuries, and, as such, is liable jointly, severally and in solido with one or more defendants for all damages which may be cast in favor of petitioner, plus costs and interest from the date of judicial demand.

2.

The defendants, **REGENT INSURANCE COMPANY** and **RC LAKE CHARLES GROUP, LLC**, are liable, jointly, severally and in solido, to the petitioner for harms and losses which she sustained, together with legal interest from the date of the incident and costs of these proceedings for the following reasons, to wit:

3.

On or about December 24, 2020 at approximately 3:40 p.m., petitioner, **HELEN ROYAL**, slipped and fell upon walking to the bathroom at the Buffalo Wild Wings in Lake Charles, Louisiana, and sustained injuries as a result.

4.

At the time of the subject incident, an employee of Buffalo Wild Wings had just mopped the floor in front of the restrooms.



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Filing Date: 12/10/2021 12:00 AM
Case Number: 2021-005174

Page Count: 4

Document Name: PETITION

5.

The aforementioned employee did not place a wet floor sign on the floor, which caused petitioner, **HELEN ROYAL**, to slip and fall.

6.

The wet and/or soapy and/or greasy floor presented an unreasonable hazard to customers and invitees of Buffalo Wild Wings.

7.

The unreasonable hazard was not readily visible or apparent, and could not be avoided despite Plaintiff's exercise of due diligence.

8.

At the time of the subject incident, petitioner was a customer of Buffalo Wild Wings.

9.

The aforementioned incident occurred solely as a result of the negligence, imprudence, and/or lack of attention of the part of **RC LAKE CHARLES GROUP, LLC**, and/or its agents/employees whose acts of negligence/fault are itemized particularly, but not exclusively, as follows:

1. Causing, creating and/or allowing the existence of an unreasonably dangerous condition in and/or on the walking surface of the office it was hired to clean;
2. Failing to properly warn of the existence of an unreasonably dangerous condition that it either created and/or that existed with its knowledge;
3. Failing to properly inspect;
4. Failing to properly train and/or supervise its employees; and
5. Other acts of negligence and/or fault to be shown at the trial of this matter.

10.

Directly and solely as a result of the collision in question, petitioner, **HELEN ROYAL**, suffered various injuries and, as a result, is entitled to recover all available damages including, but not limited to:

- a. Physical pain and suffering – past, present, and future;
- b. Mental anguish and/or emotional distress – past, present, and future;
- c. Disability and/or impairment – past, present, and future;
- d. Loss of enjoyment of life – past, present, and future;
- e. Medical expenses – past, present, and future; and

f. Any and all other damages which will be established at the time of trial.

11.

Petitioner, **HELEN ROYAL**, is therefore entitled to damages for the items set forth in such amounts as are reasonable in the premises.

12.

Petitioner is informed, believes and therefore alleges that at the time of the incident at issue the defendant, **REGENT INSURANCE COMPANY**, had issued a liability insurance policy to **RC LAKE CHARLES GROUP, LLC**, and under the laws of the State of Louisiana, was in full force and effect at the time of the incident, and which insurance inures to the benefit of Petitioner under the provisions of the Louisiana Direct Action Statute, L.A. R.S. 22:1269.

13.

Petitioner further alleges on information and belief that under the terms of the said policy, **REGENT INSURANCE COMPANY** obligated itself to pay any and all damages caused to Petitioner as a result of the negligence and/or fault of **RC LAKE CHARLES GROUP, LLC** for its negligence and/or fault alleged herein.

14.

Pursuant to the provisions of the Louisiana Code of Civil Procedure, Article 1423, *et sec.*, Petitioner is entitled to a certified copy of any insurance policies issued to and/or otherwise insuring **RC LAKE CHARLES GROUP, LLC** for the claims made by Petitioner herein. Petitioner requests a certified copy of any and all such policies of insurance within thirty (30) days of service of the petition upon them.

15.

REGENT INSURANCE COMPANY and **RC LAKE CHARLES GROUP, LLC** are therefore liable, jointly, severally, and *in solido*, unto the Petitioner for all damages sustained by Petitioner in said incident.

WHEREFORE, PETITIONER PRAYS that defendants, **REGENT INSURANCE COMPANY** and **RC LAKE CHARLES GROUP, LLC**, be served with a certified copy of this Petition for Damages, be duly cited to appear and answer this petition and that after due proceedings had and the lapse of all legal delays, that there be a judgment herein and in favor of petitioner, **HELEN ROYAL**, and against defendants, **REGENT INSURANCE COMPANY** and **RC LAKE CHARLES GROUP, LLC**, jointly, severally and *in solido*, for damages in an amount

which is reasonable within the premises, together with legal interest thereon from date of the incident until paid and for all costs of these proceedings.

PETITIONER FURTHER PRAYS for any and all additional legal and/or equitable relief which this Honorable Court may deem necessary and proper.

Respectfully Submitted,



DEVIN M. GUIDRY (Bar No. 38008)

2505 Verot School Road

Lafayette, LA 70508

Telephone: 337-214-4290

Fax: 337-704-2805

devin@getgordon.com

ATTORNEYS FOR PETITIONER,

HELEN ROYAL

A TRUE COPY
Lake Charles, Louisiana

Deputy Clerk of Court
Calcasieu Parish, Louisiana

JAN 20 2022

PLEASE SERVE:

REGENT INSURANCE COMPANY

Through its registered agent:

Louisiana Secretary of State

8585 Archives Avenue

Baton Rouge, LA 70809

RC LAKE CHARLES GROUP, LLC

Through its registered agent:

Vera Reed

c/o Horne, LLP

400 Poydras Street, Ste 1840

New Orleans, LA 70130

HELEN ROYAL * 14TH JUDICIAL DISTRICT COURT
VERSUS * DOCKET NO. 2021-005174 G
REGENT INSURANCE COMPANY, * CALCASIEU PARISH, LOUISIANA
RC LAKE CHARLES GROUP, LLC, and
BUFFALO WILD WINGS

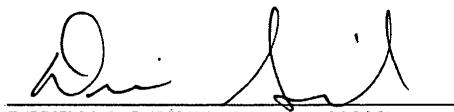
Fax 12-10-21
FILED
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REQUEST FOR NOTICE

Deputy Clerk of Court
Calcasieu Parish, Louisiana

Please take notice that DEVIN M. GUIDRY, attorney for petitioner, does hereby request written notice of the date of trial of the above matter as well as notice of hearings (whether on merits or otherwise), orders, judgments, and interlocutory decrees, and any and all formal steps taken by the parties herein, the Judge or any member of Court, as provided in Louisiana Code of Civil Procedure of 1960, particularly Articles 1572, 1913, and 1914.

Respectfully Submitted,



DEVIN M. GUIDRY (Bar No. 38008)
2505 Verot School Road
Lafayette, LA 70508
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Fax: 337-704-2805
devin@gordon.com
ATTORNEYS FOR PETITIONER,
HELEN ROYAL



C M S 7 7 9 4 6 0 7
Filing Date: 12/10/2021 12:00 AM Page Count: 1
Case Number: 2021-005174
Document Name: REQUEST WRITTEN NOTICE

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